



PET FOOD INDUSTRY  
ASSOCIATION OF AUSTRALIA INC.

CODE OF PRACTICE  
FOR THE  
MANUFACTURING & MARKETING  
OF PET FOOD

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# PART A - INTRODUCTION

## 1. Background

The Pet Food Industry Association of Australia was established in September 1972 to promote standards of excellence in the pet food industry in Australia.

The objectives of the Association include:

- To promote prepared pet food as the preferred method of providing the nutritional needs of pets;
- To establish standards for self-regulation of the industry.

This Code of Practice is designed to promote those objectives within the industry, with the aim of protecting the interests of consumers, and the public and to enhance goodwill towards the industry. This is achieved through guidelines to members on the usage of raw materials, methods of manufacture and marketing practice.

From its inception the Pet Food Industry Association of Australia Codes of Practice have been based upon best practice and the adoption of the responsible standards relating to methods of manufacture, labelling, marketing, nutritional design and claims.

Prior to 1994 the nutritional recommendations of the Association were drawn from publications of the U.S. National Academy of Sciences' National Research Council (NRC): "Nutritional Requirements of Dogs (1985)" and "Nutrient Requirements of Cats". These publications provide a sound understanding of the nutritional requirements of dogs and cats and presented the results of a wealth of research into the needs of companion animals. In 1991 criticism of the NRC recommendations emerged as they are based on semi-purified diets and the presumption of 100% nutritional availability. Manufacturers needed to make allowances for these presumptions when formulating practical diets. The American Association of Feed Control Officials (AAFCO) undertook to convene expert committees to review the recommendations and to devise a new set of standards that were of practical value to pet food manufacturers. The new standards for dog foods were first published in 1992 and the corresponding cat standards were published in 1993. These standards are updated and published annually by AAFCO.

In keeping with its commitment to best practice, the Pet Food Industry Association has monitored these developments and referred to its Code of Practice.

The Code of Practice also incorporates a number of changes which aim to ensure that the Australian pet food industry maintains its positions of international leadership. Many of these are aimed at providing more meaningful information to Australian pet owners, specific regulatory requirements and include:

- limitations with respect to therapeutic claims;
- functional products;
- specific country export requirements (such as European Union);
- management of raw materials and production.

In this latest revision of the Code, the scope has been expanded to include control of production processes. The Code includes provisions to control production through the application of HACCP in line with other industry codes of practice and Australian Standards for the production of human food and animal feed.

## 2. Scope

This Code applies to production of manufactured pet foods. It covers production of pet food from sourcing and receipt of ingredients to storage, processing and heat treatments, packing, labelling and storage of products. It also includes instructions for the uniform application of information provided on labels.

The Code is intended to protect consumers and the public by providing for control over potential hazards to animal health that might be associated with pet food. It also takes into account potential hazards to human health that might arise from cross contamination from pet food to human food. The Code is also intended to provide for the production of products of consistent quality.

Increasingly, export markets for pet food require more detailed certification. The Code aims to provide a basis for such certification by the Australian Quarantine and Inspection Service (AQIS). Individual country requirements may be appended to this Code and certified according to the market and AQIS requirements. Imported products are also subject to risk assessment by AQIS and Biosecurity Australia. This Code also aims to provide a basis for such assessment.

The Association's objectives include establishing standards for self regulation and responsibility and enhancing the goodwill of its members to consumers and the public. These aspirations are reflected in this Code.

It is recognised that with the variety of products and production systems used in the pet food industry, the intention of some of the provisions of this Code can be achieved through alternative means to those specified in the Code. Alternative compliance to the provisions of the Code may be used by operators providing that compliance with the overall goals can be validated through the use of Hazard Analysis Critical Control Point (HACCP) based programs.

## 3. Compliance and management

### 3.1 Management Committee

The PFIAA Management Committee comprises of:-

Chairman	The Chairman will be the chairman of the PFIAA Technical sub committee
Secretary & Complaints Officer	The Executive Manager of the PFIAA & Complaints Officer
Members	The nominated Technical Sub-committee members of the PFIAA

The Chairman and other members of the Management Committee will be appointed annually as per the current PFIAA procedures for the appointment of the technical sub committee.

### 3.2 Management Committee terms of reference

The terms of reference for the Management Committee include:-

- 3.2.1 An annual review of the industry's performance in compliance with the Code.
- 3.2.2 A quarterly review of complaints and their status.
- 3.2.3 Mediation and determination of disputed cases of alleged non-conformity to the code;
- 3.2.4 A review of the Code as necessary.

### 3.3 Voluntary Accreditation Mechanism

The Pet Food Industry Association of Australia will provide accreditation of pet food manufacturing establishments that comply with this code within specified limits.

The PFIAA also provides supplementary accreditation for the purpose of listing establishments for selected markets. The requirements for supplementary accreditation for selected markets are contained in the PFIAA documented protocols for listing establishments for export of pet food.

Accreditation status will be conferred if:

- 3.3.1 an auditor reports that the establishment complies with the Code within the limits specified in the Code;
- 3.3.2 in the opinion of the auditor, the establishment operates a satisfactory quality assurance program.

### 3.4 Complaint handling procedure

Allegations of a breach of the Code shall, in the first instance, be pursued by the person or organisation making the complaint directly with the person or company alleged to have breached the Code. Companies may, of course, take direct action under relevant legislation independently of the Code to protect their interests.

In the event that the complaint remains unresolved, the complainant may then lodge the complaint with Pet Food Industry Management Committee. The Complaints Officer will be responsible for the day to day management of the complaints system including:-

- 3.4.1 Establishment of a 'Complaints Log' to record and track all complaints received;
- 3.4.2 Requests for input from both the complainant and the company alleged to have breached the Code in writing within fourteen (14) days from the receipt of the request;

The Management Committee will then attempt to resolve the complaint through mediation, if necessary involving the CEO of the company against which the complaint is made.

If the complaint cannot be resolved within twenty eight (28) days through meditation, it will be reviewed by the Management Committee who will decide whether further action is required based on the information to hand and the degree of importance of the complaint.

At the request of the Management Committee the member company subject of the complaint will produce all supporting material necessary to assess the validity of the complaint.

The management Committee will have the authority to co-opt the services of appropriate experts as required. Such co-opted experts will have no voting rights. The costs incurred in the co-opting of appropriate experts will be covered by the parties to the complaint on a basis pre-determined by the management Committee and agreed in writing by the parties prior to the co-opting of such services.

### 3.5 Remedial actions

The objectives of this voluntary Code of Conduct are to assist and encourage member companies to provide meaningful information to consumers, often beyond what the law requires. It is nevertheless important for the continued integrity of the Code that matters which are determined to be outside the spirit of the Code and which are deemed of sufficient importance be followed through by the Management Committee.

One or more of the following actions may be taken where breaches of the Code have been clearly established and negotiations have failed to resolve the issue.

- 3.5.1 Upon notification in writing, the member company may be required to give a written undertaking to discontinue, within a specified time frame, any practice which has been determined to constitute a breach of the Code.
- 3.5.2 Upon notification in writing, the member company may be required to issue corrective statements as appropriate. The format, size, wording, mode of publication and method of distribution of such statements will be subject to the approval of the Management Committee prior to release/publication.
- 3.5.3 A breach of the Code may be referred to an appropriation regulatory authority.
- Continued refusal by the offending member company to undertake the required remedial action may lead to the Management Committee recommending the suspension or expulsion of the member from the relevant industry organisation where permitted under the Articles of Association of that organisation.

### 3.6 *Sanctions*

An establishment will not be accredited until the auditor reports that it complies with the Code of Practice within the limits of compliance necessary for accreditation.

If the limits of compliance are exceeded at accredited establishments, the auditor informs the PFIAA that the establishment is provisionally accredited. If the auditor is satisfied either by conducting a further audit, or by other evidence, that the corrective action requests have been attended to by the date agreed with the management of the establishment, the PFIAA should be informed that full accreditation status is resumed.

If corrective action requests are not attended to by the agreed date, the auditor will recommend to the PFIAA that accreditation should be withdrawn. Accreditation will not be resumed until a satisfactory audit has been completed.

### 3.7 Listing for access to overseas markets

AQIS is the governing body responsible for providing export certification for petfood, and other products. Where required by overseas markets, establishments producing these products in Australia and requiring AQIS to certify overseas market requirements, may have a choice between two systems.

- Holdings or establishments may be monitored, audited and listed for export to the particular market through the industry association nominated by AQIS. AQIS will then conduct audits of this process through the agreed industry association.

OR

- Holdings or establishments which do not wish to be audited by an industry association are to be audited and monitored directly by AQIS to ensure they comply with the overseas market legislation.

All establishments must have a program that addresses all the relative points outlined in the overseas markets legislation for the particular product that is to be exported from their establishment. The initial program must be assessed and approved as appropriate before the establishment is listed for export to the overseas market. AQIS will provide certification on the basis of continuing approval of the establishment's program.

The PFIAA will recommend to AQIS that establishments should be listed as eligible to export pet food to specified countries in the following circumstances:

- 3.7.1 there shall be an industry-based quality assurance arrangement (Code of Practice and individual overseas market requirements) agreed between AQIS and the PFIAA;
- 3.7.2 individual establishments should be accredited by the PFIAA according to this Code of Practice and relevant overseas market requirements;

- 3.7.3 the establishment shall be audited by a PFIAA approved auditor for compliance with importing country requirements according to the industry-based quality assurance arrangement for the specified country.

## 4. Definitions

For the purpose of this Code of Practice, the following definitions shall apply:

Advertising or Advertisement	as used in the context of this Code includes any written or verbal statement, notice, presentation, illustration, or depiction or labelling, which is directly or indirectly designed to effect the sale of any industry product or to create an interest in the purchase of any such product, whether same appears in a newspaper, magazine or other periodical, in a catalogue, letter or sales promotional literature, in a radio or television broadcast, or in any other media.
Best before date	means the date signifying the end of the minimum durable life of the food contained in the package.
Commercial sterility	means the condition achieved by the application of an approved heat treatment process, sufficient alone or in combination with other appropriate treatments, to destroy pathogens of concern and render the products shelf stable.
Complete pet food	means a food that meets the minimum recommended nutritive requirements for the target species as adopted by the Association and outlined in Part B of the Code. Such a food may also commonly be described as “complete and balanced”. In this context the use of the word “balanced” does not add any property to the claim as the concept of nutritional balance is included in the definition of “nutritionally complete”.
Family of products	is a group of products which possess the same recipe base, product form and processing technology and hence might reasonably be expected to possess a common nutritional profile.
Food additive	includes any colouring, flavouring, preservative, antioxidant, artificial sweetener, vitamin, mineral or modifying agent.
High risk area	areas of an establishment where cooked product is handled and where it is necessary to maintain segregation from uncooked product to prevent cross-contamination from raw to cooked product.
Industry product	means a food for dogs or cats and includes all types of dry, semi-moist, retorted, pasteurised and other commercial pet food manufactured and/or marketed for consumption by domesticated dogs or cats.
Ingredients	are the constituent materials making up a food for dogs or cats.
Meat	means any part of an animal, game, or bird which contains protein and which is ordinarily, or in nature, used as a food by dogs or cats, whether fresh, chilled, frozen or dried.
Pasteurised product	means pet food that is subjected to an approved heat process that addresses pathogens of concern but does not render the product shelf

stable. It means a product that:

- has been heated to at least 70°C at the core for a minimum of 30 minutes;
- has been cooled to less than 7°C within 6 hours;
- is prevented from being recontaminated;

or equivalent process

Pet	means a domesticated dog or cat
Pet food	means any multi ingredient, manufactured food for feeding to pets. Presented in sealed, printed packaging & branded and labelled as per PFIAA guidelines. Manufactured using good manufacturing practices and in a facility operating a quality system based on food safety principles. May be Complete and Balanced or Complementary.
Pet meat	means meat in the raw state, or unprocessed meat. Visually identifiable as meat only and not for human consumption. Presented in unbranded packaging and processed and identified in accordance with the “Australian Standard for the production of pet meat” (AS4841:2006).
Prescribed name	means the name of a food, ingredient or additive as defined in the provisions of the FSANZ Food Standards Code.
Red-banded pet meat	meat derived from abattoirs that has been assessed as not suitable for human consumption and is intended for thermal processing.
Shall	the word “shall” is used in the Code to signify that compliance with a provision of the Code is obligatory.
Shelf stable	means the condition achieved at which pet food in its manufactured state can be stored and handled under non-refrigerated conditions without microbial deterioration.
Should	the word “should” is used in the code to signify that a provision of the Code is recommended.
Therapeutic pet food	APVMA Guidelines for the therapeutic pet foods that require registration by the APVMA are referenced in Appendix 2.
Use by date	means the date signifying the end of the shelf life of the food contained in the package from a food safety perspective.
Yellow banded pet meat	meat derived from knackereries and suitable for pet meat.

## **PART B - MANUFACTURING**

### **5. Management and production practices at pet food manufacturing establishments**

#### **OUTCOME REQUIRED**

Documented procedures and processes are in place to assure the production of safe pet food.

- 5.1 The operator of a manufactured pet food establishment shall have a documented quality assurance system that:
- 5.1.1 includes the policy objectives of the pet food establishment for the production of pet food products that are safe and fit for purpose;
  - 5.1.2 describes the organizational structure, the provision of resources and the provision of training of personnel;
  - 5.1.3 describes the system of operational hygiene and process controls that ensure that pet food products are safe and fit for purpose and are accurately identified in accordance with this Code of Practice;
  - 5.1.4 specifies how each requirement of this Code of Practice that applies to the production undertaken at the establishment will be met by the operator;
  - 5.1.5 contains procedures for each stage of production at the premises;
  - 5.1.6 uses records to validate and verify the production of pet foods that are safe and fit for purpose;
  - 5.1.7 provides for internal audits and management reviews of the operational activities and policy objectives of the pet food establishment. The results of these reviews and the action taken are to be documented;
  - 5.1.8 provides for the implementation of a HACCP plan for each family of products produced at the establishment;
  - 5.1.9 there is a system in place for the handling of raw material including traceability of raw materials.

#### **The HACCP plan**

- 5.2 The HACCP plan as required above shall conform to the steps and principles set out in "Hazard analysis and critical control point (HACCP) system and guidelines for its application" in the Annex to Codex Alimentarius "Recommended International Code of Practice General Principles of Food Hygiene"; CAC/RCP 1-1969, Rev. 4-2003.

### **6. Good manufacturing practices**

#### **OUTCOME REQUIRED**

The manufacturing environment and personnel are not a source of risk to product quality and safety.

- 6.1 Procedures to control potential risks to the safety and quality of products from personnel, premises, surrounds, and services shall be documented.
- 6.2 Personal hygiene procedures shall ensure that:
- 6.2.1 staff facilities are maintained in a clean condition;

- 6.2.2 adequate locker/storage facilities are provided for staff to store personal effects including footwear and clothing;
  - 6.2.3 protective clothing, footwear and head gear are provided where applicable;
  - 6.2.4 eating, drinking and smoking areas are provided separate from production facilities.
- 6.3 Personal hygiene policies should be documented including:
- 6.3.1 hand washing;
  - 6.3.2 eating, drinking and smoking locations and conditions;
  - 6.3.3 clothing requirements;
  - 6.3.4 wearing of jewellery and watches;
  - 6.3.5 treatment of cuts and wounds;
  - 6.3.6 staff movement restrictions between high risk and low risk areas.
- 6.4 Visitors to the plant and contractors should follow the personal hygiene procedures.
- 6.5 Work in progress, material to be reworked or reincorporated into product shall be identifiable and segregated in storage.
- 6.6 Procedures shall be in-place to protect ingredients and products from contamination by glass, wood and other physical hazards. Unprotected glass shall be excluded from production and storage areas. Wooden implements shall not be used where they might affect product safety
- 6.7 The risk of contamination of products by metal or other foreign objects shall be assessed and procedures developed to eliminate contamination. Where it is deemed necessary to use metal detection equipment, procedures for the operation of metal detectors shall be documented. The procedures shall include:
- 6.7.1 testing or calibration of the metal detector sensitivity;
  - 6.7.2 methods of handling product rejected by a metal detector;
  - 6.7.3 procedures for re-checking product in the event that routine monitoring of a metal detector indicates the equipment has failed or is out of calibration.
- 6.8 Stock rotation procedures should be in place to ensure that the oldest ingredients and products are used first. The effectiveness of stock rotation procedures should be verified by documented inventory checks.
- 6.9 Water used as an ingredient, for cleaning, and for hand washing shall be fit for purpose.
- 6.10 Where water is recycled or reused, quality standards for the quality of the recycled or reused water shall be documented and procedures to maintain the required quality shall be in-place.

## 7. Construction – premises and equipment

### OUTCOME REQUIRED

Construction of premises and equipment facilitates safe and hygienic processing and prevents contamination of product.

- 7.1 A site plan for the establishment shall be available. The plan should identify any high risk areas.
- 7.2 The site shall be drained to prevent surface water entering the plant.
- 7.3 Floor drainage inside production and storage areas shall be contained to prevent pooling of water on floors.
- 7.4 Buildings in which pet food manufacturing operations including raw material handling, production, packaging and storage take place shall be fully roofed. The roof shall be in good repair and weather proof. Ingredients and finished products may be stored in outside bins or silos provided the bins or silos and associated conveying equipment are enclosed and weather-proof.
- 7.5 The surface of walls, partitions and floors shall be impervious with no toxic effect in intended use
- 7.6 Walls and internal divisions shall have a smooth surface up to a height appropriate to the operation
- 7.7 Ceilings and overhead fixtures shall be constructed and finished to prevent the build up of dirt and condensation and the shedding of particles
- 7.8 Doors shall have smooth impervious surfaces and shall be close fitting to prevent access by insects and pests into the plant
- 7.9 External areas shall be constructed so that they can be cleaned as appropriate and shall be kept clean. Roadways shall be properly graded, compacted, dust-proofed and drained.
- 7.10 There shall be a program to maintain external areas including gardens, lawns and other vegetation to reduce potential harbourages for insects, pests and rodents.
- 7.11 Adequate site security shall be provided to minimise the possibility of accidental or deliberate contamination of product.
- 7.12 Procedures to control access of contractors, transport operators, customers and other visitors to the site and their movements about the plant shall be documented and implemented.
- 7.13 Procedures to ensure that all visitors to the site are aware of the potential impact of their actions on all aspects of product safety, quality and environment shall be documented and implemented.
- 7.14 An effective waste disposal system to regularly remove waste or contaminated materials from the site shall be in place.
- 7.15 Adequate facilities and equipment shall be provided and maintained for the storage of waste prior to its removal from the premises. These facilities shall be designed to prevent contamination. Waste containers shall be clearly identified, leak proof and, where

appropriate, should be covered. Waste containers should be cleaned and sanitised at an appropriate frequency to minimise potential contamination.

- 7.16 Premises shall be designed for wet weather operation. The operator should be able to load and/or unload product and ingredients without significant water damage.
- 7.17 Ventilation within pet food manufacturing facilities shall provide sufficient air exchange to prevent unacceptable accumulation of steam, condensation or dust and to remove contaminated air.

## 8. Plant and equipment

### OUTCOME REQUIRED

Plant and equipment is designed and operated to safeguard product safety and quality

- 8.1 Equipment that comes into contact with pet food should be designed and constructed to ensure that, where necessary, it can be adequately cleaned, disinfected, maintained and inspected.
- 8.2 Equipment shall be designed, constructed and maintained to prevent contamination of the product by physical hazards.
- 8.3 Equipment shall operate to appropriate quality standards to ensure that potential physical and chemical hazards arising from inadequately maintained equipment are controlled.
- 8.4 All plant and equipment should be kept in a state of good and safe working order by using a regular and logged preventative maintenance program.

## 9. Cleaning

### OUTCOME REQUIRED

Cleaning procedures are appropriate and effective in protecting product safety and quality.

- 9.1 Cleaning and sanitation procedures shall be documented.
- 9.2 Cleaning procedures should specify items of equipment and plant areas to be cleaned.
- 9.3 A schedule for cleaning identified items of equipment and plant areas shall be documented. The schedule should include methods of cleaning, chemicals used and their strength, the frequency of cleaning and who is responsible for particular tasks.
- 9.4 Cleaning procedures shall be monitored and results recorded. Where monitoring shows that cleaning has been inconsistent or ineffective, corrective action shall be taken and recorded.
- 9.5 Equipment and chemicals used for cleaning shall be identified and stored separately from food production areas.
- 9.6 Staff who carry out cleaning duties shall be adequately trained.

## 10. Pest control

### OUTCOME REQUIRED

Pest control programs control the risk of contamination of products by pests and pest control chemicals

- 10.1 Pest control procedures to prevent infestation by insects, birds, rodents and other pests shall be documented.
- 10.2 The procedures should include:
  - 10.2.1 maintenance of buildings and surrounds to eliminate breeding sites and prevent access of pests into production and storage areas. Holes, drains and other places where pest can gain access should be sealed. Doors and windows into production and storage areas should be close fitting and kept closed as far as possible;
  - 10.2.2 a schedule for the application of pest control chemicals with identification of pests which the chemicals are aimed at controlling;
  - 10.2.3 instructions for the use and maintenance of other pest control devices such as traps, insectocutors, pheromone traps;
  - 10.2.4 an accurate bait map identifying the location and type of pest control device.
- 10.3 Records of the application of chemicals including the name of the chemical and quantities used shall be maintained.
- 10.4 Buildings and surrounds shall be regularly examined for evidence of infestation and to assess the effectiveness of the pest control program.
- 10.5 Pest control devices shall be located such that ingredients and products cannot become contaminated from fall out.
- 10.6 Bait stations should be secured to prevent them being moved or tampered with. Toxic baits should not be used inside building where pet food ingredients or packaging are stored or production takes place.

## 11. Ingredients

### OUTCOME REQUIRED

Purchasing, receipt and storage of ingredients must be planned and documented to maintain product quality and safety standards and provide records for the purpose of traceability.

- 11.1 Ingredients – sourcing and purchasing
  - 11.1.1 All raw materials used in the manufacture of pet foods shall comply with the relevant acts and regulations of the States and/or Commonwealth.
  - 11.1.2 Procedures for raw material purchasing shall be documented. Purchasing procedures shall include methods for assessing suppliers and should be based on the risk of potential hazards to product quality and safety associated with the ingredient.
  - 11.1.3 The methods of assessing suppliers should include verification that suppliers of both bulk and packaged products have suitable product tracing procedures.
  - 11.1.4 Ingredient suppliers should be provided with specifications of the required ingredients.

## 11.2 Ingredients – receipt

- 11.2.1 Receipt of all deliveries of ingredients including packaging materials shall be recorded. Records should include reference to purchase orders or appropriate purchasing documentation, supplier, type of material, date of receipt, quantity received and identifiers that can be used for the purpose of traceability such batch number, use-by date, packing date or date of manufacture.
- 11.2.2 Establishments shall have a documented program for the sampling and testing of ingredients to ensure compliance with contract specifications.
- 11.2.3 Ingredients that do not meet specifications shall be identified and isolated and disposition decided by an authorized person.

## 11.3 Ingredients – Storage

- 11.3.1 All storage areas should be designed and maintained to prevent damage to, contamination, unintended mixing or deterioration of ingredients or packaging materials.
- 11.3.2 To ensure proper identification, all fixed and mobile bins, silos, tanks and bagged storage areas shall be clearly identified. Records of the storage location of ingredient shall be maintained.
- 11.3.3 Silos, bins or tanks and warehouses should be inspected regularly for structural integrity and condition of contents. Special care should be taken to look for and eliminate wet spots, mouldy product and insect infestation in dry ingredients. Bins and storage areas should be ventilated to avoid condensation.
- 11.3.4 Facilities for storage of chilled and frozen products shall have sufficient capacity to accommodate all ingredients and products that are required to be held under refrigeration.
- 11.3.5 All storage areas should be maintained in a clean and tidy condition and in a manner that minimises the risk of contamination by birds, rodents and insects.

## 11.4 Chemicals and hazardous materials

- 11.4.1 All chemicals that are not product ingredients should be assessed to determine any potential hazard to product safety and quality and shall be handled accordingly.
- 11.4.2 Procedures for handling chemicals that are not product ingredients, such as cleaning chemicals, pest control chemicals and boiler treatments shall be documented. The procedures should eliminate risks of accidentally contaminating ingredients or products with chemicals.
- 11.4.3 Non-ingredient chemicals should be stored away from ingredients.
- 11.4.4 Chemicals used for pest control should be registered for their intended use and should be used in a controlled manner according the manufacturers' instructions by suitably trained personnel.
- 11.4.5 Access to cleaning chemicals should be limited to authorized staff. Cleaning chemicals should be returned to the specified storage area after use.
- 11.4.6 All containers used for storing, mixing and distributing hazardous chemicals shall be identified and shall only be used for the identified purpose.
- 11.4.7 Material safety data sheets for all cleaning chemicals and hazardous materials stored on-site shall be available.

## 12. Process control

### REQUIRED OUTCOME

Methods of processing pet food must be planned and controlled to ensure production of safe product of consistent quality.

#### 12.1 General

- 12.1.1 Production processes shall be controlled through the application of a HACCP based plan, associated procedures, work instructions, monitoring and verification.
- 12.1.2 Records shall be kept which confirm that procedures are followed and identify corrective action taken in the event that there are departures from procedures or quality standards.
- 12.1.3 Where temperature control of the raw materials, intermediate or finished product and or environment is critical to product safety and quality, for example in production of non-heat treated refrigerated pet food, temperatures should be adequately controlled, monitored and recorded.
- 12.1.4 Processes shall include procedures for storage and handling of chilled and frozen ingredients to prevent unacceptable deterioration of ingredients before use
- 12.1.5 Formulations of pet food shall be documented.
- 12.1.6 Where formulations can be adjusted, for example within the constraints of a least-cost formulation program, the formulation of every batch shall be recorded and records of the formulation kept for a period of time at least equivalent to the shelf life of the product.
- 12.1.7 Batch records of ingredients used should be recorded and retained.
- 12.1.8 Where product or product in production is reworked, the inclusion of rework in formulations shall be documented to allow traceability of the ingredients in the original production to the product containing the rework.
- 12.1.9 Product that cannot be identified by its original production shall not be used in production of further pet food and shall be disposed of as waste.
- 12.1.10 Rework for incorporation into subsequent batches of product shall be labelled appropriately.
- 12.1.11 Procedures for the handling, labelling, storage and incorporation of rework into product shall be documented.

#### 12.2 Commercially sterilised shelf stable pet food (cans, pouches, trays or like)

- 12.2.1 Process control applied to canned pet food shall include:
  - 12.2.1.1 application of a heat treatment that has been verified as achieving commercial sterility and which complies with the requirements of section13;
  - 12.2.1.2 procedures to ensure that containers are undamaged before use;
  - 12.2.1.3 control of the mass of product dispensed into a container;
  - 12.2.1.4 container closing procedures including inspection and measurement of the container seals and seams to ensure that the finished product is hermetically sealed in the container. The parameters of container seals or seams necessary to achieve a hermetic seal shall be specified. Container seam measurements shall be recorded and where

measurements do not comply with container seal or seam specifications corrective action shall be taken;

12.2.1.5 transfer of closed containers to the heat treatment without unnecessary delay and within a specified time;

12.2.1.6 procedures for cooling containers after the heat treatments. Procedures during cooling shall prevent the possible contamination of product;

### 12.3 Cooked pet food intended for refrigerated storage

12.3.1 Process control applied to cooked pet food intended for refrigerated storage shall include:

12.3.1.1 application of a heat treatment as outlined in section 13;

12.3.1.2 procedures for storage and handling of chilled and frozen ingredients to prevent unacceptable deterioration of ingredients before use;

12.3.1.3 control of the mass of product dispensed into casings or primary packaging.

12.3.1.4 procedures to move product from filling to the heat treatment without delay and within a specified time;

12.3.1.5 cooling of cooked product to as outlined in section 13.

### 12.4 Uncooked pet food intended for refrigerated storage

12.4.1 Process control applied to uncooked pet food intended for refrigerated storage shall include:

12.4.1.1 identification of processing parameters such as temperature, use of additives, adjustment of pH, adjustment of water activity that are necessary to achieve the stated use by date or shelf life;

12.4.1.2 procedures for producing products according to the identified processing parameters;

12.4.1.3 procedures for the storage and handling of chilled and frozen ingredients;

12.4.1.4 control of the mass of product dispensed into primary packaging.

12.4.2 Finished product should be cooled, stored and dispatched at 5°C or less.

### 12.5 Dry pet food

12.5.1 Process control applied to dry pet food shall include:

12.5.1.1 application of a heat treatment as outlined in section 13.

12.5.1.2 control of drying conditions including time and temperature to ensure that products are dried to a specified water activity and/or equivalent moisture content to produce a shelf stable product;

12.5.1.3 procedures for the cooling of product before packing;

12.5.1.4 control of the mass of product dispensed into primary packaging.

### 12.6 Semi-moist and other products

12.6.1 Process control applied to semi-moist and other products including treats shall include:

- 12.6.1.1 application of a heat treatment as outlined in section 13, for those products for which heating is necessary for product safety and/or stability.
- 12.6.1.2 identification of processing parameters such as temperature, use of additives, adjustment of pH, adjustment of water activity or other microbial control processes that are necessary to achieve the stated use by date or shelf life;
- 12.6.1.3 procedures for producing products according to the identified processing parameters;
- 12.6.1.4 control of the mass of product dispensed into primary packaging.

## 13. Heat treatment

### OUTCOME REQUIRED

Products are cooked or heated consistently to eliminate potential microbial hazards and to achieve the required shelf life under specified storage conditions.

#### 13.1 General

- 13.1.1 The heat treatments used in pet food production shall be clearly identified in a process control plan or the HACCP plan.
- 13.1.2 The operating parameters of the heat treatments shall be specified and control measures designed to ensure that specified operating parameters are met shall be documented
- 13.1.3 Where the heat treatment is intended to control microbial hazards, the microbes of concern shall be identified and critical limits that provide a measure that acceptable control has been applied at the heat treatment shall be nominated.
- 13.1.4 The operating parameters of heat treatments, and where applicable the product temperature, shall be monitored for every batch or at suitable intervals for continuous process. Where monitoring indicates that heat treatments are not operating according to the specified limits corrective action shall be taken. Result of monitoring and any corrective action shall be recorded.

#### 13.2 Commercially sterilised shelf stable pet foods (cans, pouches trays or like)

- 13.2.1 Heat treatments applied to canned or retorted pet food products shall be verified as able to produce a commercially sterile product by a suitably qualified person. The heat treatments applied to all product types and container size combinations shall be verified as able to produce a commercially sterile product.
- 13.2.2 Appropriate heat treatments applied to shelf stable wet products shall be established taking into account the product composition and characteristics including preservatives, pH, and water activity.
- 13.2.3 Where red-banded pet meat is used, either the meat or the pet food product shall be heat treated to achieve commercial sterility.

#### 13.3 Cooked pet foods intended for refrigerated storage

- 13.3.1 Pet foods not containing red-banded pet meat shall be pasteurised by heating followed by cooling to 5°C or less.
- 13.3.2 The heat treatment and cooling process shall be verified as adequate to achieve the nominated shelf life of the product.

#### 13.4 Dry pet foods

- 13.4.1 Pet foods for which the method of preservation is heating through an extrusion process followed by drying should be heated to an internal temperature that achieves commercial sterility.
- 13.4.2 Following extrusion, products should be dried to a water activity of less than 0.65.
- 13.4.3 Higher water activity in the finished product may be used where mould growth is controlled by mould inhibitors, other humectant ingredients or packaging methods. The water activity in combination with mould-growth inhibitor shall be low enough to prevent the growth of mould in the product during storage.

#### 13.5 Semi-moist and other products

- 13.5.1 Pet foods for which the method is heating, with or without extrusion, followed by adjustment of water activity and/or pH by drying and/or addition of additives and humectants should be heated to an internal temperature which in combination with adjustment of water activity achieves commercial sterility.
- 13.5.2 For semi-moist and other products with or without heat treatments, the water activity should be specified taking into account whether the product is intended for refrigerated or non-refrigerated storage, use of mould inhibitors, pH adjustment and type of packaging. The water activity in combination with mould growth inhibitors, packaging and storage temperature shall be low enough to prevent the growth of mould in the product during storage.

## 14. Storage

### **OUTCOME REQUIRED**

Following processing and heat treatment, if required, products are stored in conditions that maintain their safety.

- 14.1 All products shall be stored off the floor.
- 14.2 Products that are not intended for refrigerated storage shall be stored in a clean and dry environment.
- 14.3 Where specific storage conditions are required to maintain the safety and quality of non-refrigerated products, the conditions shall be specified and utilised.
- 14.4 Products intended for chilled refrigerated storage shall be stored at a product temperature of 5°C or less.
- 14.5 Product in chillers shall be protected from deterioration and contamination through contact with condensation.

## 15. Sampling and testing

### OUTCOME REQUIRED

Product testing is based on safety and quality risks and samples are representative of production.

- 15.1 Requirements for sampling and testing products should be identified through the HACCP process and should be based on assessment of risk to product quality and safety. Product testing shall be conducted to verify nutritional information on labels.
- 15.2 Sampling and testing programs where required shall be documented and should identify:
  - 15.2.1 methods of sampling aimed at obtaining representative samples and avoiding cross contamination between samples;
  - 15.2.2 how samples are packaged and stored to avoid deterioration or changes in the nature of the sample,
  - 15.2.3 how samples are labelled to ensure traceability to production;
- 15.3 Testing methods including product assessments shall be documented and where applicable based on validated methods. Testing should be undertaken by appropriately trained and equipped staff on-site or at external laboratories that are NATA accredited for the test to be carried out.
- 15.4 Results of product assessments and testing shall be assessed against documented tolerances, standards or specifications and appropriate records maintained. Where results fall outside tolerances, further investigation and/or appropriate corrective action shall be taken and records maintained.

## 16. Calibration

### REQUIRED OUTCOME

The accuracy of inspection, measuring and test equipment is sufficient to ensure that products can be shown to comply with specification ranges.

- 16.1 Equipment used to inspect, measure or test products or processes shall be checked for accuracy and calibrated as required. Procedures for testing and calibration of inspection, measuring and test equipment shall be documented. Documented procedures shall include:
  - 16.1.1 a list of all inspection, testing and measuring equipment that is checked and calibrated. The list should include the location of the equipment and how it is identified;
  - 16.1.2 the frequency of checks and calibrations;
  - 16.1.3 methods of checking and calibrating equipment;
  - 16.1.4 the acceptable degree of accuracy of equipment;
  - 16.1.5 corrective action to be taken in the event that equipment is found to be not operating within the acceptable limits of accuracy. Corrective action may include identification of equipment that is out of calibration and reinspection and/or recovery of product that may have been tested or produced with out-of-calibration equipment.

- 16.2 Records of checks and calibrations of inspection measuring and test equipment and corrective action taken shall be maintained.

## 17. Product tracing and recall

### OUTCOME REQUIRED

Pet food ingredients and products are accurately identified and can be recalled if necessary.

- 17.1 There shall be a system of document keeping in place that ensures the identification of the sources of all ingredients and the traceability of finished products.
- 17.2 If any pet food has to be recalled, the documents kept by the business shall be comprehensive enough to identify all the products that should be recalled.
- 17.3 All product in store either in bulk or packaged, and at dispatch shall be identified at least by date or time of production or packaging, or by use-by date or best before date or by batch number and the identity of the pet food business at which it was produced or packed.
- 17.4 Product recall procedures shall be documented. The documented procedure shall identify:
- 17.4.1 the members of a recall committee;
  - 17.4.2 the responsibilities and the contact details of the committee member including out of hours contact information;
  - 17.4.3 methods to identify, locate and control recalled product;
  - 17.4.4 how recalled product will be isolated on return until appropriate disposal procedures have been determined;
  - 17.4.5 the circumstances that could trigger a recall such as an investigation of customer complaints, notification of the recall of an ingredient or advice from regulators.
  - 17.4.6 how the recall procedure is tested by conducting a mock recall.
- 17.5 The recall system shall aim to:
- 17.5.1 minimise or eliminate the risk of possible injury or death to animals by prompt retrieval of potentially hazardous products;
  - 17.5.2 notify relevant government authorities, explain corrective action and keep authorities informed of developments;
  - 17.5.3 minimise disruption and inconvenience to distributors and customers.
- 17.6 At the completion of a recall the recall committee shall document the details of the recall and shall review the effectiveness of the recall. If necessary corrective action shall be implemented if the review identifies inadequacies in the recall procedures.

## 18. Record keeping

### REQUIRED OUTCOME

Records kept and available to support product quality management and traceability.

- 18.1 A system of record keeping relevant to the company quality assurance program and other aspects of the business, as required, shall be documented and implemented.
- 18.2 Records shall be retained for a specified time period. The retention time is dependent on the type of record but shall be no less than any legal requirement, the use-by date of the product or 12 months, whichever is the greater.
- 18.3 Records shall be retained in conditions that protect the integrity of the records.
- 18.4 Where records are retained in electronic format they shall be protected from unauthorised amendment.
- 18.5 Electronic records and documents shall be protected from loss by an effective back-up procedure.

## 19. Training

### REQUIRED OUTCOME

Staff are trained in relevant procedures to ensure the production of products according to safety and quality specifications.

- 19.1 All staff shall receive induction training that should include relevant issues for the manufacture and safety of the products and the personal hygiene requirements of the pet food company.
- 19.2 Training requirements shall be identified and documented. All staff, including supervisors whose duties affect product quality and safety shall have appropriate training to carry out those duties.
- 19.3 Specific training requirements such as training in HACCP, handling of therapeutic goods, and internal auditing should be identified.
- 19.4 A schedule for training staff and methods of training including assessments of competency should be documented.
- 19.5 Records of training activities, assessments of competency and relevant training certificates shall be maintained.
- 19.6 The effectiveness of the company training program shall be reviewed at least annually.

# PART C – LABELLING, MARKETING & NUTRITION

## 20. Labelling

### REQUIRED OUTCOME

Staff To ensure consumers receive consistent and accurate information on pack about the pet food and that all regulatory requirements are satisfied.

- 20.1 A label should contain sufficient information to enable a purchaser or prospective purchaser to determine the nature and composition of the product and the purpose for which it is suitable.
- 20.2 Advertising, labelling, brand or trade names, vignette, graphic and pictorial illustrations or other references associated with an industry product shall not contain direct or implied representations which are misleading or have the capacity and tendency or effect of misleading or deceiving purchasers or prospective purchasers .
- 20.3 Commercially sterilised shelf stable pet food (cans, pouches, trays or like) and wet pet food intended for refrigerated storage.
- For the purpose of this provision, water sufficient for processing and additives listed in this section shall not be considered ingredients.
- 20.3.1 If a meat ingredient constitutes 25% or more of the meat component and is the major ingredient then that meat may be referred to as the variety name of the meal.
- E.g.: Where beef is the main ingredient in a meal and is present at more than 25% then the variety can be named “Beef”.
- 20.3.2 Where a meat ingredient constitutes 25% or more of the meat component but is not the main ingredient, then the variety can be named by a name which refers to the ingredient and to a generic term for a meal which may contain other ingredients (including ingredients in greater proportions) provided the ingredient being named is present in greater proportions than in variety than in any other variety within the relevant product range.
- E.g.: Where a meal contains 25% beef and 30% chicken and is the highest beef content variety in the relevant product range, it could be sold under the variety name “beef dinner”, “beef casserole”, or “beef stockpot” etc.
- 20.3.3 Where any meat ingredient is present at a greater than 5% but at less than 25% of the product then the variety name can be refer to the meal as being “with” that ingredient.
- E.g.: Where a meal comprises 30% beef and 10% liver, the variety could state “with liver”.
- 20.3.4 Where two or more meat ingredients are referred to in a variety name, then the combined percentage of those ingredients is taken into account for the purpose of determining what variety name can be used in accordance with the above guidelines, provided that each named ingredient is present at levels of at least 5% of the meat component.
- E.g.: If a meal included 20% beef and 10% liver, then it has more than 25% of those ingredients when combined so that its variety name would be “beef and liver” if beef were the main ingredient in the product or “beef and liver dinner” or “beef and liver casserole”, etc if beef were not the main ingredient.

E.g.: If a meal is labelled “beef with liver and kidney” then beef shall be the main ingredient in the meal, it shall have more than 25% of the named ingredients when combined, and it shall have at least 5% of each of liver and of kidney. Similarly, a meal labelled as being “with liver and kidney” shall contain at least 5% of each of liver and kidney.

- 20.3.5 A pet food label may include a flavour designation which conforms to the ingredient name which is the source of the flavour, as shown in the ingredient statement, or where the ingredient statement shows any other source of that flavour. In such cases the word “flavour” or “flavours” shall be printed in the same size type and equally conspicuously and the ingredient(s) from which the flavour designation is derived.

#### 20.4 Dry pet food including Jerky, Chews etc.

For the purpose of this provision:

meat components shall be calculated on a reconstituted basis using recognised rendering factors;

where other named ingredients are included they are to be treated, for naming calculation purposes, as an adjunct to meats.

- 20.4.1 In a product containing at least 20% meats and where a meat ingredient comprises 25% or more of the combined meat component and is the major meat ingredient. Then that meat may be referred to as the variety name of that meal.

E.g.: Where beef is the major meat ingredient in a meal and the total meat content of the meal exceeds 20% then the variety can be called “Beef”.

- 20.4.2 In a product containing at least 20% meats and where a particular meat ingredient constitutes 25% or more of the meat component but is not the main ingredient, then that variety can be named by a name which refers to that ingredient and to a generic term for a meal which may contain other ingredients (including ingredients in greater proportions), provided that the ingredient being named is present in greater proportions in that variety than in any other variety within the relevant product range.

E.g.: Where a meal contains at least 20% meat and the beef and poultry levels of the meat component are 26% and 30% respectively, and is the variety with the highest beef content in the range, it can be sold under variety name “beef platter or “beef dinner” etc.

- 20.4.3 Where a meat ingredient is present at greater than 5% but less than 20% of the product then the variety name can refer to the meal as being “with” that ingredient.

E.g.: Where a meal comprises 10% beef, the variety name can state “with beef”.

- 20.4.4 Where two or more ingredients are referred to in a variety name, then the combined percentage of those ingredients is taken into account for the purpose of determining what variety name can be used in accordance with the above guidelines. The secondary named ingredients shall be present at a level of at least 20% of the meat content.

E.g.: For meal containing at least 20% meat:

if the meat component includes 20% beef and 10% liver, then the meat component comprises more than 25% of those ingredients when combined so that the variety would be “beef and liver” if beef were the main ingredient of the meat component. However, if the beef component was 23% and the liver 2% then the liver name in

invalid as the minor named ingredient shall be at least 20% of the meat i.e. in this case 4% of the product.

E.g.: In a meal labelled as being “with liver and kidney”, the combined levels of liver and kidney shall exceed 5% of the product and each named ingredient shall be at least 20% of the meat component i.e. in this case 1% of the product.

20.4.5 A pet food label may include a flavour designation which conforms to the ingredient name which is the source of the flavour, as shown in the ingredient statement, or where the ingredient statement shows any other source of that flavour. In such cases the word “flavour” or “flavours” shall be printed in the same size type and equally conspicuously as the ingredient(s) from which the flavour is derived.

20.5 The label affixed to a package containing an industry product shall have stated thereon:

20.5.1 All statutory information required by relevant State and Commonwealth regulations but including:

*“the words PET FOOD ONLY or ANIMAL FOOD ONLY in letters with a face depth of not less than 5mm which shall constitute the first line or lines of the label and no other word shall be written on the same line or lines, provided that in the case of pet food packed in a can it shall be sufficient if the words PET FOOD ONLY with a face depth of not less than 5mm are embossed on one end of the can”*,

*“in a prominent position and clearly visible, an illustration of the whole of the body or the head of a dog or cat”*

(Victorian Meat Industry Act, 1993)

In the case of cans it is acceptable to inkjet the words PET FOOD ONLY onto one end of the can to replace embossing. The words shall be legible.

An industry member should not misrepresent directly or indirectly in advertising, labelling, brand or trade name or otherwise that a product is fit for human consumption.

20.5.2 A statement of guaranteed typical analysis. These analytical statements will be expressed on an “as is” basis. In each instance the following should be provided:

<b>Guaranteed analysis</b>	<b>Typical analysis</b>
Minimum % crude protein	% crude protein
Minimum % crude fat	% crude fat
Maximum % crude fibre	% crude fibre
Maximum % crude salt (sodium chloride)	% crude salt (sodium chloride)

Typical analysis is defined as the average analysis of a total of twenty-four (24) samples taken equally from three different date product production runs and any individual analysis will not vary more than 10% of the stated value.

- 20.6 Manufacturers are encouraged to provide a “Directions for Use” statement on the label of an industry product. Such statements shall be legible, informative (for example feeding guides or recommendation to have water available) and accurately reflect the pet food description. These directions may be brief where label space is limiting.
- 20.7 The label on or attached to a package of shall include information relating to the date of packing that can be used to maintain traceability of product.
- 20.7.1 Commercially sterilised products or products having a shelf-life of > 2 years shall include information relating to the date of packing.
- 20.7.2 Dry Petfood, Semi-Moist Petfood and Petfood treats and all other products with expected shelf-life of 12- 24 months shall include a best-before date that can be used to maintain traceability of the product.
- 20.7.3 Products with a shelf life of less than 12 months including those requiring refrigeration, shall be assessed as to which date marking format to use (ie ‘best before’ or ‘use by’) in accordance with the ANZFA standard 1.2.5 Date Marking.
- 20.7.4 All petfood products, unless commercially sterilized, shall include a statement of any specific storage conditions required that will ensure that the product will remain wholesome and safe until the Use by or Best before date on the product.
- 20.7.5 Manufacturers will have effective product recall and retrieval procedures in place.
- 20.8 New product flashes (for example “NEW”) should only appear on labels for a maximum of 6 months from the first sale.
- 20.9 Ingredient Lists
- 20.9.1 The label on or attached to a package containing pet food shall contain a statement of the ingredients of the food contained in the package. Ingredients will be presented in an informative and consumer friendly manner. All the ingredients of a packaged food, with the exception of water sufficient for processing, shall be declared in a statement arranged in descending order of the proportion by weight of the ingredient contained in the food.
- 20.9.2 Where the composition of the food may be subject to minor variations by the substitution of an ingredient with another ingredient performing a similar function, the ingredients may be listed in the following form:  
“(name of ingredient) and/or (name of substitute ingredient)”
- 20.9.3 A label affixed to a package of pet food which contains meat, offal or bone, shall have set out thereon particulars indicating the species of animal from which the meat, offal or bone was derived (*New South Wales Stock Foods Act 1940 – Regulation No. 490*).
- 20.9.4 Where an ingredient belongs to a class of ingredients commonly described by a generic name e.g. by-products, that name may be used in the statement of ingredients instead of the prescribed name provided all ingredients are accurately disclosed. These generic class names may be preceded by a suitable word(s) to further specify the ingredient e.g. beef by-products.
- 20.9.5 Where a food additive belongs to a class described by one of the names set out in this paragraph, that name may be used in the statement of ingredients to identify that food additive:
- |              |             |                |                          |
|--------------|-------------|----------------|--------------------------|
| antioxidants | flavours    | humectants     | preservatives            |
| vitamins     | colours     | food acids     | minerals                 |
| stabilisers  | emulsifiers | gelling agents | mineral salts thickeners |

- 20.9.6 Where a food additive is capable of performing more than one function, the class name most appropriate to the function being performed in the particular food shall be used, and if the food additive could reasonably be placed in more than one class of food additive in regard to its function in a particular food, either or any of those class names may be used. A food additive not generally accepted as belonging to a generic class shall be declared in the statement of ingredients by use of its prescribed name.

It is incumbent upon the manufacturer of an industry product in which food additives are included to ensure their use and applied levels are safe.

## 21 Marketing

### REQUIRED OUTCOME

Advertising should not contain any representation with respect to the identity, composition or suitability of an industry product or an ingredient thereof, which contradicts, negates or is otherwise inconsistent with any representation, statement, direction for use, or other information which appears in the labelling of such product.

- 21.1 An industry member should not directly or indirectly in advertising, labelling or otherwise:
- 21.1.1 Engage in the defamation of its competitors by imputing to them dishonourable conduct, inability to perform contracts, questionable credit standing, or by making other defamatory representations about them, or
  - 21.1.2 Disparage the quality, grade, origin, appearance, composition, suitability, nutritional properties, cost, value, type, consistency, form, colour, flavour, method of manufacture, manner of preparation, or lack of novelty of its competitors' products.
- 21.2 An industry member should not misrepresent directly or indirectly in company, brand or trade name, or in advertising, labelling or otherwise:
- 21.2.1 the length of time it has been in business, or
  - 21.2.2 the extent of its sales, or
  - 21.2.3 its rank in the industry as a producer or distributor of a product or type of product, or
  - 21.2.4 that it owns or operates a laboratory, breeding or experimental kennel, or that its products have been tested in any particular manner or for any period of time or with any particular results, or
  - 21.2.5 that a product, ingredient, or manufacturing process is new or exclusive, or
  - 21.2.6 any other material aspect of its business or products.
- 21.3 An industry member shall have sufficient and acceptable substantiation of endorsement, testimonials, award advertising, labelling, brand or trade name, or otherwise:
- 21.3.1 that a product or ingredient thereof has been prepared according to the formula, direction, or personal supervision of, or is prescribed by, or is the first choice of, or has been inspected, guaranteed, recognised, approved or used by; or meets or exceeds the specifications or standards of; or is otherwise endorsed by a particular individual, or by government or non-governmental agency, or by professionals such as veterinarians, chemists, physicists or psychiatrists or by organisation, breeders, kennels, sportsmen, hunt clubs, or animal hospitals; or
  - 21.3.2 that a product is the recipient of a bona fide merit award or seal of approval; or
  - 21.3.3 that a product or an ingredient thereof has been inspected by the government or any agency thereof and that it has passed that inspection.

## 22 Nutrition

### REQUIRED OUTCOME

Industry products should be of a nutritional standard adequate to meet the requisites of the description, implied and explicit advertising claims.

- 22.1 An industry member should not represent directly or indirectly, in advertising, labelling, brand or trade name, or otherwise that an industry product, or a recommended feeding thereof, is or meets the requisites of a complete, perfect, scientific or balanced ration for dogs or cats unless such product satisfies the requirements for nutritional “completeness” outlined as follows.
- 22.2 A nutritionally complete pet food is one which, when fed for an extended period as the only source of nutrition other than water, will provide for all the energy and nutritional needs of the particular animals of the given species and physiological state for which it is intended and can be validated as such by conforming to the relevant AAFCO standard.
- 22.3 The following qualifications apply to “nutritional completeness” claims:
- 22.3.1 If a manufacturer labels a product as a complete pet food without qualification, it is assumed to be complete for all life stages and has been validated as such by conforming to relevant Association of American Feed Control Officials’ (AAFCO) nutritional requirements.
  - 22.3.2 If the product is designed for a specific life stage, then the label shall clearly state this and conform to the relevant AAFCO standard, e.g. “nutritionally complete for the maintenance of adult dogs”, or “a nutritionally complete pet food for growing kittens”.
- 22.4 Each manufacturer shall ultimately accept responsibility for the accuracy of the statements made in labelling and advertising with respect to the nutritional status of the products produced.
- 22.5 Many factors may alter the bio-availability of a particular nutrient. Manufacturers are advised to refer to the National Research Council 1985 document for dogs and the National Research Council 1986 document for cats which describe the main factors that are known.
- 22.6 Manufacturers are advised of the desirability of adequate quality control sampling and analysis programs to ensure consistent delivery of the claimed performance. It is outside the scope of these guidelines to define such procedures as these will be determined by a range of factors unique to individual manufacturers.
- 22.7 Validation of nutritional completeness for each family of products will be undertaken by:
- 22.7.1 chemical analysis and comparison with the relevant Nutrient Profile (species and life stage). In this instance the label claim should not exceed “Meets the nutritional levels established by the Association of American Feed Control Officials Cat/Dog Food Nutrient Profile for \_\_\_\_\_ (blank is to be completed by using the stage or stages of the pet’s life, such as maintenance, growth, etc), or
  - 22.7.2 the successful completion of relevant feeding protocols as detailed by the AAFCO. Deviations from the AAFCO Nutrient Profiles are acceptable in instances where nutritional completeness has been verified through feeding trials. In this instance the label claim should not exceed “Complete and balanced nutrition for \_\_\_\_\_ (blank to be completed by using the stage or stages of the pet’s life, such as maintenance, growth, etc) substantiated by testing performed in accordance with the procedures established by the Association of American Feed Control officials.
- 22.8 Representations or claims by an industry member that a product is superior to other products from the stand-point of quality, comparison, nutritional properties or method of manufacture

should not be made unless the advertiser has established on the basis of accurate comparative analysis of scientifically valid tests that such is the fact.

22.9 It is deceptive to offer for sale or sell an industry product which is not suitable for use as a food for dogs or cats. To avoid misleading prospective purchasers in this respect it is generally necessary to disclose clearly and conspicuously the particular purpose for which the product is suitable. This disclosure is especially necessary where in the absence thereof purchasers would be led by the advertising to believe that the product is nutritionally complete.

22.10 Advertising should not contain any representation with respect to the identity, composition or suitability of an industry product or an ingredient thereof, which contradicts, negates or is otherwise inconsistent with any representation, statement, direction for use, or other information which appears in the labelling of such a product.

22.11 Advertising should not contain any representation with respect to the identity, composition or suitability of an industry product or an ingredient thereof, which contradicts, negates or is otherwise inconsistent with any representation, statement, direction for use, or other information which appears in the labelling of such a product.

22.12 Definition of Description terms

The definition below should be used as guide when making the following statements on products. They are sourced for the official Publication of the Association of American Feed Control Officials. These guidelines specify the maximum ME and fat a product can have to be call "lite/low fat". In addition to these absolute levels the products shall be 15% below the rest of the product family.

#### **Light/Lite/low calorie**

##### **Dog**

For products with moisture less than 20% the ME should not exceed 310 kcal/100g. For products with moistures from 20% to 65% the metabolisable energy (ME) should not exceed 250kcal/100g. For products with a moistures level greater than 65% the ME should not exceed 90kcal/100g.

##### **Cat**

For products with moisture less than 20% the ME should not exceed 325kcal/100g. For products with moistures from 20% to 65% the ME should not exceed 265kcal/100g. For products with a moisture level greater than 65% the ME should not exceed 95kcal/100g.

For the purpose of the ME (metabolisable energy) calculation the follow equation can be used

$$ME = 10((3.5*\text{crude protein}) + (8.5*\text{crude fat}) + 3.5*\text{NFE}))$$

#### **Lean/low fat**

##### **Dog**

For products with moisture less than 20% the fat content should not exceed 9%. For products with moistures from 20% to 65% the fat content should not exceed 7%. For products with a moisture level greater than 65% the fat content should not exceed 4%.

##### **Cat**

For products with moisture less them 20% the fat content should not exceed 10%. For products with moisture from 20% to 65% the fat content should not exceed 8%.

For products with a moisture level greater than 65% the fat content should not exceed 5%

22.13 Dietary and Therapeutic Claims, APVMA Guidelines for therapeutic pet foods that require registration by the APVMA is detailed in a separate code. This Code is referenced in appendix 2. The APVMA Guidelines for therapeutic pet foods that require registration, is helpful in defining and providing examples of products, ingredients and claims that do or do not require registration.

## **APPENDIX 1: Nutrient profiles for dog and cat foods**

Nutrient profiles are published by the Association of American Feed Control Officials Inc. (AAFCO) in the AAFCO Official Publication updated annually. This publication is available at the web site [www.aafco.org](http://www.aafco.org)

## **APPENDIX 2: Australian Pesticides and Veterinary Medicines Authority:**

Guidelines for therapeutic pet foods that require registration by the APVMA as veterinary chemical products.

These guidelines are available at the web site [www.apvma.gov.au](http://www.apvma.gov.au)

## **APPENDIX 3: Feed ingredient purchasing guidelines**

These guidelines have been written in response to the detection of contaminants in feed ingredients that can present pet food safety risk issues for our industry. These guidelines are provided for use by petfood manufacturers, to better manage the function of sourcing and purchasing raw materials used in the manufacture of petfood.

These guidelines should be used in conjunction with PFIAA Code of Practice, the PFIAA national QA accreditation program. There are a number of requirements within the Code of Practice that relate to ingredient sourcing, purchasing and receipt. These guidelines provide more detailed directions for manufacturers to allow them to have a better understanding of what should be done to meet the relevant Code of Practice requirements and to minimise risk.

Pet Food Manufacturers should do the following:

*Complete a site hazard risk plan.*

The Site Hazard Risk Plan should define which raw materials present the greatest feed safety risk. This grid provides an indication of the types of raw materials rated against each risk. This grid can be modified to meet site requirements. Adequate controls for those raw materials that present a higher risk to food safety must be put in place, following identification of critical control points.

NOTE: This risk assessment is based upon an assessment of feed and food safety risk, companies should also be assessing risk relevant to occupational health and safety and access to MSDS information.

*A documented raw material sourcing and purchasing program should be implemented that minimises potential product quality and safety risks, be they biological, chemical or physical.*

The purchasing program needs to define the methods used to select and monitor suppliers of raw materials. Supplier approval may be based on:

- Previous supply history
- Company QA accreditation
- Supplier visits/audits
- Completion of a Quality Questionnaire

Where raw materials are purchased through distributors, it is important that this distributor is an approved supplier. Where products are manufactured overseas then distributed in Australia, emphasis should be placed upon the QA accreditation of the manufacturing site, which should be confirmed by the distributor. Preferential supply arrangements should be given to companies having QA accreditation and supporting this where relevant through the provision of a Certificate of Analysis with each batch of raw materials delivered. Part of the approval process for distributors should also be that they verify C of A test results with their

overseas suppliers. Feed manufacturers should not assume that this is being done and need to confirm the QA steps being undertaken by their suppliers.

Products should not be purchased from non-approved suppliers.

*Relevant specifications for all materials used must be accessible at the site. Specifications should be based on American Association of Feed Control Officials (AAFCO) standards, National Agricultural Commodities Marketing Association (NACMA) standards, other recognised industry standards or individual company acceptance standards. Specifications should take into consideration such issues as grain treatment withholding periods. Ingredient suppliers should be provided with specification or contract definitions of the quality of the raw material to be supplied.*

As well as recognised standards, substances prohibited by legislation and other regulatory requirements should be defined eg. Maximum Residue Limits as defined by the APVMA. Examples of prohibited materials that should be defined in specifications include:

- Weed seeds
- Heavy metals
- Chemical residues
- Environmental contaminants such as Dioxin
- Microbial presence such as salmonella
- Mycotoxins

Different prohibited material specifications will apply to different raw materials, eg heavy metal specification is more relevant to mineral sources and weed seeds to grains. Products should, wherever practicable, be sourced from suppliers who can demonstrate compliance with a quality assurance system and/or can demonstrate that their products comply with purchase specifications and relevant State legislation.

*Plants must have in operation a documented quality control program for the sampling and testing of incoming raw materials to ensure compliance with contract specifications and to ensure that they meet product quality standards.*

- At receipt, all raw materials must be initially assessed by an authorised person and not unloaded or used without the authorisation of that person.
- Appropriate tests should be applied to all raw materials on receipt to detect any obvious biological, chemical or physical contamination risks and any other product quality risks.
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Where provision of a Certificate of Analysis (C of A) is a requirement before an ingredient can be used, procedures need to be put in place to:

- Verify the laboratory providing the C of A is a third party laboratory.
- Confirm that the laboratory is accredited, preference for NATA accreditation.
- Ensure the batch number on the C of A matches that on the packaging of the goods received. If they do not match contact supplier to gain correct C of A, and do not allow use of the ingredient until this occurs.

Based upon the risk assessment for higher risk raw materials, the C of A needs to include analysis for prohibited materials. For example, minerals such as zinc oxide and zinc sulphate should include heavy metal analysis in addition to zinc results. Where doubt exists regarding the validity of the C of A, samples should be taken on receipt and tested to validate results. The ingredient should not be used until results of analysis are available.

Where prohibited materials cannot be detected at receipt, and no Certificate of Analysis (C of A) is supplied, the ingredient should not be used until results of analysis are available.

December 2008 *References- Based on Stockfeed Manufacturers Council of Australia, Guidelines Q17 v1; NATA is National Association of Testing Authorities*

## **APPENDIX 4: Melamine contamination of petfood**

Contamination of petfood with melamine has become a significant concern for petfood manufacturers.

Initial adulteration of petfood ingredients followed by unintentional contamination at trace levels has caused the petfood industry and regulators to consider levels of melamine which are safe and indicate the absence of adulteration.

PFIAA considers that guidelines being instituted by the Codex Committee on Contaminants in Food (CCCF) following the World Health Organisation expert consultations (December 2008) be adopted.

The maximum level of melamine in petfood is 2.5 ppm and any levels lower be reported as clear of melamine.

May 2009

References: Codex CCCF report <http://www.codexalimentarius.net/web/archives.jsp?lang=en>